CG Docket No. 10-51, In the Matter of Structure and Practices of the Video Relay Service Program.

CG Docket No. 03-123, In the Matter of Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities

Comments filed by

The Students in
COM 390 – Accessible Communication Technologies,
taught by Christian Vogler in the Spring of 2012 at Gallaudet University

and

Christian Vogler, PhD
Director, Technology Access Program
Associate Professor
Department of Communication Studies
Gallaudet University
800 Florida Ave NE
Washington, DC 20002

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Who we are

COM 390 is a class that is taught annually at the Department of Communication Studies at Gallaudet University in the spring semester, with a strong emphasis on accessible communication technologies for the deaf and hard of hearing. Covered topics include access to 9-1-1, relay services, accessible telecommunications, and captioning. This class is currently taught by Christian Vogler, who is the director of the Technology Access Program, a co-principal investigator of the Rehabilitation Engineering Research Center on Telecommunications Access (RERC-TA), and also a co-chair of the Technical Subcommittee of the Emergency Access Advisory Committee.

Summary

The communication accessibility class under Christian Vogler at Gallaudet University has reviewed and discussed some concerns and complaints about the current VRS that we would like to share. These are in the areas of technical standards and per-user compensation.

Technical Standards

One big issue we have noticed is technical standards within videophone (VP) services. We have made a list of five different ways where technical standards come in as an issue: leaving messages, call alerting, video quality, calling anyone via ten digit numbering, and address book transfer. These issues are very important because they each carry barriers with communication in the deaf community. If these issues can be resolved then it is possible to have equality with deaf and hearing making phone calls, at last!

First, there isn't equal accessibility to leave messages for people on the VP if there is a missed call. Only few services provide the ability to leave a message and it interferes with others who don't have that service; they can't leave nor receive messages. This is not equal to hearing abilities because any device made for the hearing people can leave a message on an answering machine.

Second, hearing people have ringing alerts on their phones that allow them to hear when a call is coming in. How is this helpful to the deaf? It isn't. Deaf people need flashing lights to let them know that they are receiving a call. Not all VPs are capable of doing so. They need to set standard ability to be able to hook up to house systems to have the lights flash when a call is being received.

Third, video quality is an issue. Each VP has a different set up for video quality. All need to have a standard set up so that video quality is clear and readable for the deaf. With calls being frozen and blurry it becomes frustrating to make calls.

Fourth, is the equal ability to call anyone, anywhere. All VP systems need to set a ten-digit phone number. This way, any VP can call to any VP without the use of an IP number. As well as any hearing person can call any VP ten-digit number without having to go through the video relay services first with IP numbers. Having a ten-digit number set up can make things so much easier not only for the deaf but for anyone who interacts with deaf people as well.

Last but not least, is the issue of transferring address books across videophones. Currently we cannot transfer address books to different VPs, but hearing people can transfer address books across voice phones. So, we need a standard for address books.

We believe that technical standards in these five areas are very important to ensure functional equivalence.

Per-user Compensation

We oppose the FCC proposal that each VRS become per user instead of per minute. We think changing it to per-user would be not functionally equivalent for everyone. When deaf people lock into one VRS provider, then they will have limited options of VRS providers while hearing people can choose from multiple phone companies. That means we would be unable to switch to another provider until our "lock in" period is over. At that time, we would then have to "lock in" to a different provider, and hope that that provider works out well for us. It seems as if there is no freedom of choice for telecommunication users for deaf people.

We oppose to the idea of "per minute" changing to "per user" for six reasons: interpreter quality, profits, incentive to make customers happy, going to a different provider if there are problems, the small market of deaf sign language users, and freedom of choice:

First, it is possible to potentially affect quality of interpreters working with VRS.

Second, it could affect the VRS company's profits if services are not as good. They can't hire many interpreters due to budget. This means we have to wait longer to receive a call from an interpreter. VRS companies could lose business which could cause less competition like monopoly, which is bad.

Third, they could be less incentive to truly make their customers happy.

Fourth, we can't go to a different VRS as "back up" when the original VRS is not working well on the VP maybe due to technology or responding. Customer user becomes stuck and they have no choice other than VRS. We have different preferences of using VRS providers for different reasons: personal, mobile, and business. VRS providers have different interpreting skills such as they are good with professional calls related to business. While we use other VRS provider interpreters for personal calls because their interpreting skills are warmer and easier to communicate with. We prefer VRS providers on mobile phones but it depends on quality and speed of calls. Some mobile phones are not great with certain VRS providers due to quality or other reasons.

We also would like to note that four out of six class participants had to switch VRS providers, because of technical problems. For example, we tried to call with a VP, but had problems with the video. Switching to a computer with a different VRS app helped.

Fifth, there are few deaf users who use sign language compared to the general hearing population. So, the VRS market is small, and it is hard to find new users. We

can't find ALL those deaf; if VRS's objective is finding NEW users. It will affect the "old" users negatively as they are not as high up on the priority list for VRS.

Last reason is where is our functional equivalence. It is like the FCC tells us there is no freedom of choice.

We strongly encourage the FCC to keep VRS services using per minute instead of per user due to our functional equivalency. It is not all about budget issues; it is about our customers being satisfied with communication access through VRS. They could change some rules instead of changing to per user from per minute.

Respectfully submitted

/s/ The students of the COM 390 class:
Yana Novikova
Amit Rupani
Rachel Sweigart
And two unnamed students

/s/ Christian Vogler

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